UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 W. JACKSON BLVD
CHICAGO, IL 60604

27 MAR 2013

MEMORANDUM

SUBJECT: Enforcement Action Memorandum – Determination of an Imminent and Substantial Threat to Public Health and or the Environment at the Pioneer Asphalt Site, Lawrence County, Lawrenceville, Illinois (Site ID #B5YU)

FROM: Kevin Turner, OSC
Emergency Response Branch 1

THRU: Jason H. El-Zein, Chief
Emergency Response Branch 1

TO: Richard C. Karl , Director
Superfund Division

I. PURPOSE

This Action Memorandum documents the determination of an imminent and substantial threat to public health and the environment and is necessary for approval to conduct a time-critical removal action at the Pioneer Asphalt Site in Lawrenceville, Lawrence County, Illinois (the Site). The location of the Site within Illinois is depicted in Figure 2, attached hereto. The response actions proposed herein are necessary in order to mitigate threats and potential threats to public health, welfare, and the environment posed by the presence of hazardous substances at the Site, including but not limited to waste tars, ignitable and corrosive wastes in soils and drums, and uncontrolled friable asbestos. U.S. EPA has documented the uncontrolled release of hazardous substances, especially asbestos at concentrations which necessitate this removal action.

The time-critical removal action proposed herein includes the following activities:

- Confirm and characterize the nature and extent of waste tars, drum contents, tank contents, benzene, toluene, ethylbenzene, and xylene (BTEX)-contaminated soils and asbestos throughout the area proposed for clean-up;

- Remove and properly dispose of two underground storage tanks, waste tars, drummed material, contaminated soil, debris and asbestos found on Site;

- Backfill excavated areas with clean fill and grade Site as necessary.

As explained at greater length in the attached confidential enforcement addendum, U.S. EPA and Ziegler Chemical and Mineral Corporation, a potentially responsible party (PRP), are currently discussing entering into an Administrative Order on Consent (AOC) which would allow Ziegler Chemical and Mineral Corporation to perform the removal action described herein with U.S. EPA oversight. U.S. EPA has consulted, and will continue to consult, with the Illinois Environmental Protection Agency concerning this Site.

These response actions will be conducted in accordance with Section 104(a)(1) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 USC § 9604(a)(1) and 40 Code of Federal Regulations (CFR) § 300.415 of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP) to abate or eliminate the immediate threat posed to public health and/or the environment by the presence of the hazardous substances on Site. The uncontrolled conditions of the hazardous substances present at the Site require that this action be classified as a time-critical removal action. This action is anticipated to require 90 days to implement.

There are no nationally significant or precedent setting issues associated with the Site. The Pioneer Asphalt Site is not proposed for the National Priorities List (NPL).

II. SITE CONDITIONS AND BACKGROUND

CERCLIS ID: ILN 101 015 004
Category: Removal Action

In July 2010, representatives from Illinois EPA conducted an investigation at the Site which included the collection of samples from several different media. Three samples were collected from drums which contained elevated Photoionization Detector (PID) readings. Elevated levels of BTEX were detected in one drum on-site. Two drums indicated elevated levels of total petroleum hydrocarbons (TPH) and diesel range organics (DRO). One sample was collected from a drum labeled "phosphoric acid" and was found to have a pH of 1.19, and one sampled drum had a flashpoint of 80 °F.

In July 2010, a representative from Illinois EPA's Bureau of Air collected six samples from suspected asbestos containing materials. The results of the samples indicated that transite, crysotile, and amosite, all friable asbestos, were present. Friable asbestos is a listed hazardous substance under 40 C.F.R. § 302.4. The samples were collected from thermal insulation, surface debris on concrete slabs, and tank bases. Each of the sampled areas that tested positive for asbestos (as described below) is prone to migration on and off site.

A. Site Description

1. Removal Site Evaluation

From the early 1900s until approximately 1985, the Pioneer Asphalt Company manufactured asphalt and other related products at the Site. In July 1985, the Ziegler Chemical and Mineral Corporation acquired the Pioneer Asphalt Company, incorporating and renaming it the Pioneer Asphalt Corporation. In November 1985, the Pioneer Asphalt Corporation acquired the Site and facility from the Witco Corporation, and commenced asphalt and other product manufacturing there. At the present time, the Pioneer Asphalt Corporation still owns the Site but has not manufactured anything at the Site since approximately 2004.

The hazardous and solid wastes found on-site are the result of manufacturing operations and related activities that occurred on and around the Site from the early 1900s until sometime in 2004.

The facility on-site was a comparatively small asphalt plant, located on slightly over twelve acres. The plant was divided into four areas: Area 1 consisting of an office building, locker room, laboratory, maintenance shop, and still area; Area 2 was a tank farm storage area; Area 3 was the container filling operations and tank car loading and unloading area; and Area 4 was the product storage, product bagging and filled asphalt operations area.

During the Illinois EPA inspection in July 2010, and again during the U.S. EPA site visit in September 2010, oily surface water was observed entering an American Petroleum Institute (API) oil/water separator located on the east side of the Site. Flow from the API oil/water separator (API separator) goes into the City of Lawrenceville's sanitary sewer system. Excess surface water, however, will flow for approximately one-half mile from the API separator before entering the Embarras River. Although the Illinois EPA samples collected from the API separator did not reveal significant levels of BTEX constituents or TPH, this location remains an area of concern due to the potential negative impact on the Embarras River.

According to information provided by Ziegler Chemical Corporation, during its operation of the asphalt plant, there were 26 tanks on-site ranging in capacity from 6,000 to 350,000 gallons. Depending on their location within the facility these tanks contained fuel oil, flux, soft wax, propane extract, unipet 9 wax, and roofers flux.

2. Physical Location

The Site is located at 802 Ash Street, Lawrenceville, IL, 62439 and covers approximately 12 acres within the southeastern end of Lawrenceville (Figure 1).

The town of Lawrenceville is located at the intersection of Illinois State Route 50 (east/west) and Illinois State Route 1 (north/south) in Lawrence County, Illinois (Figure 3). Lawrenceville is about 50 miles north Evansville, Indiana, and 100 miles southwest of Indianapolis, Indiana. The

geographical coordinates for the Site are 38.729° North latitude and -87.681° West longitude. The Site is located in a mixture of residential and commercial properties on the south end of Lawrenceville. The town of Lawrenceville has a population of approximately 4,800.

The area surrounding the Site was screened for Environmental Justice (EJ) concerns using Region 5's EJ Assist Tool (which applies the interim version of the national EJ Strategic Enforcement Assessment Tool (EJSEAT)). Census tracts with a score of 1, 2, or 3 are considered to be high-priority potential EJ areas of concern according to U.S. EPA Region 5. The Site is in a census tract with a score of 6. Therefore, Region 5 does not consider this Site to be a high-priority potential EJ area of concern. Please refer to the attached analysis for additional information (Attachment A).

3. Site Characteristics

On July 20, 2010, Illinois EPA collected drum, tank and asbestos samples. On September 27 and 28, 2010, U.S. EPA, Illinois EPA and a contractor for Ziegler Chemical and Mineral Corporation mobilized to the Site. Illinois EPA collected additional samples and U.S. EPA and Illinois EPA helped to direct the PRP's contractor in locating these samples. Activities performed during the visits included:

- Identifying some of the constituents and characteristic properties of the drum contents, tank contents, surface soils and asbestos at the Site, and;
- Determining if a removal action was warranted at the Site based on National Contingency Plan (NCP) criteria.

Illinois EPA sampling results documented elevated levels of diesel range organics, BTEX, low pH (1.19), ignitable substances, and asbestos. Prior to these investigatory activities by Illinois EPA and U.S. EPA, the Site was not the subject of governmental cleanup actions.

4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant

Illinois EPA inspections located approximately 250 drums on Site with unknown contents. Many of these drums were unlabeled. All of the drums identified were completely exposed to the outside elements. Several of the above-ground tanks were found to have been cut off at a level exposing the liquid contents near the top, and were releasing unknown tar-like materials onto the ground. These observed tar-like materials were mixed with water and asbestos which had fallen off of nearby tanks and may include mixtures of flux, soft wax, unipet 9 wax, and/or roofers flux asphalt. The dilapidated conditions at the Site, and the resultant environmental threats, prompted Illinois EPA to sign an order to seal the facility on July 1, 2010.

BTEX (all constituents are known human carcinogens) were detected in an on-site drum. Illinois EPA was able to determine that the BTEX-concentrations were elevated, but the accurate concentrations of BTEX have yet to be determined. (Due to laboratory procedure, the BTEX concentration results are considered estimates and further characterization is needed to determine actual concentrations.) Two waste drums indicated elevated levels of total petroleum

hydrocarbons (TPH) and diesel range organics (DRO) (29,800 mg/kg and 41,800 mg/kg respectively) which exceeds Illinois EPA's Tiered Approach to Corrective Action Objectives (TACO) default value of 6,000 mg/kg for surface soils. One sample was collected from a drum labeled "phosphoric acid" and was found to have a pH of 1.19 which is characteristic of corrosivity. (Criteria Level (pH <2.0). Illinois EPA sample #301, had a flashpoint result of 80 °F and is considered a hazardous waste that exhibits the characteristic of ignitability. This indicates that flammable materials are present on the property.

Friable asbestos is considered a hazardous substance under 40 C.F.R. § 302.4. Illinois EPA's testing found friable asbestos within the demolition debris at the Site. Friable asbestos in the debris has the potential to leave the Site via airborne migration.

NPL status

The Pioneer Asphalt Site is not listed on the NPL and has not been proposed for listing on the NPL.

5. Maps, pictures and other graphic representations

Figure 1 - Site Diagram; Figure 2 - Site Location Map; Figure 3 - Lawrenceville Site Map; and Figure 4 – Pioneer Asphalt Photo Log. Attachment A - Environmental Justice (EJ) Analysis

B. Other Actions to Date

1. Previous actions

Other than the investigatory activities conducted by Illinois EPA and U.S. EPA and discussed in Section II. A. 3-4 of this memorandum, and some limited investigations done by Ziegler, U.S. EPA is unaware of any governmental or private actions that have been undertaken to clean up the Site.

2. Current actions

U.S. EPA has accepted the Illinois EPA's request that this Agency conduct a time-critical removal action at the Site, and is discussing with PRP Ziegler Chemical and Mineral Corporation the possibility of the PRP's cleanup of the Site.

C. State and Local Authorities' Roles

On August 26, 2010, the Illinois EPA submitted a letter to U.S. EPA requesting assistance from the U.S. EPA Region 5 Superfund Division in conducting a potential time-critical removal action at the Site. As discussed in Section II. A. 3-4 of this memorandum, Illinois EPA conducted investigatory activities at the Site in 2010, prior to requesting U.S. EPA's assistance in cleaning up the Site.

III. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The conditions at the Pioneer Asphalt Site present both a release and a potential threat of release of a CERCLA hazardous substance, presenting an imminent and substantial endangerment to the public health, welfare, and the environment, and meet criteria for a time-critical removal action provided for in the National Contingency Plan (NCP), 40 C.F.R. §300.415(b)(2). These criteria include, but are not limited to, the following:

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;

This factor is present at the Pioneer Asphalt Site due to the existence of containerized hazardous waste and substances in drums, barrels, tanks and other bulk storage containers. During Site visits, both the Illinois EPA and U.S. EPA have documented the presence of waste tars (flux, soft wax, unipet 9 wax, and roofers flux asphalt) and other contaminates that demonstrated the hazardous characteristics of ignitibility and corrosivity, friable asbestos within the demolition debris and soils on-site, and asbestos on above-ground storage tanks. In addition, there were a number of drums as well as two underground storage tanks containing possible hazardous substances that will be subject to further analysis and possible removal as part of this response action.

The hazardous wastes found on the Pioneer Asphalt site have no secondary containment, and the contents of some of the 55-gallon drums are documented as containing ignitable and corrosive hazardous substances. U.S. EPA has documented more than 250 fiber and metal drums on-site. Some of the drums contained a black tar-like substance and several drums were overturned or ruptured. The main roadway of the facility is covered with a tar-like substance which has been released from cut-off above-ground tanks.

On February 20, 2013, U.S. EPA observed continued deteriorating on-site conditions. U.S. EPA observed spills and releases of waste tars, in the same area where Illinois EPA had documented waste tars that were hazardous because of the characteristics of ignitibility that may migrate from the Site via storm water discharge to contaminate nearby properties or the municipal storm water collection system. Storm water run-off with an oily sheen was seen flowing into an on-site API oil/water separator. This separator, when operated properly, discharges to the city's publically owned treatment works (POTW). The POTW discharges storm water to nearby ecosystems and ultimately the Embarras River. Storm water was also observed discharging off-site near the south entrance gate of the facility. The storm water entered an off-site ditch, flows east and into the Embarras River.

The contamination at the Site exists at or near the ground surface where it may easily migrate via surface water runoff. Although an extensive geological study of the Site has not been performed, area soils appear to be of a porous, sandy nature, which could facilitate migration of contaminants to groundwater.

In order for a liquid waste to exhibit the characteristic of ignitability, it must have a flashpoint of less than or equal to 140 °F, according to 40 CFR 261.21. Illinois EPA waste sample #301 exhibited a flashpoint of 80 °F, which is less than the 140 °F limit required for a material to meet the characteristic of ignitability. Therefore, this is considered a hazardous waste that exhibits the characteristic of ignitability and is evidence flammable materials are present on the property.

Although some of the liquid wastes and substances found on-site are currently containerized, the conditions on-site are unstable, and Illinois EPA documented spills in and around the various tanks and drum storage areas. These spills most likely came from either the tanks or the drums, and/or occurred during the Ziegler Chemical and Mineral Corporation's demolition of the Site in 2005. As observed by Illinois EPA and U.S. EPA during various site visits, these spills and/or releases were never properly cleaned-up to acceptable environmental standards. The Pioneer Asphalt Site is located within the town of Lawrenceville, Illinois. The Site is across the street from a park and a baseball field. Residential properties are located to the east and north of the Site boundaries. The Site, though sealed by Illinois EPA, is accessible, shows signs of vandalism and poses potential risks to trespassers and the surrounding residents.

Hazardous substances or pollutants or contaminants in soils largely at or near the surface that may migrate or pose a threat of release;

Friable asbestos was found in rubble and debris on-site, was released by scrapping activities and was left open to the elements such that it could be blown or tracked off-site. Several of the cut-off above-ground tanks were observed to contain a mixture of water, waste tars and asbestos which had dropped off or blown in from other nearby tanks. Continued deterioration of the Site together with scrapping activities is likely to produce additional friable asbestos from exposed pipe insulation, tanks wrapped in asbestos and transite. In fact, during a Site visit in February of 2013, the OSC observed that more asbestos material had dislodged from existing structures and dropped onto area soils. Friable asbestos is a listed hazardous substance under 40 C.F.R. § 302.4. Airborne friable asbestos is an inhalation hazard and is known to cause fibrotic scarring of lung tissue, potentially leading to asbestosis, mesothelioma, and lung cancer. Potential exposure to friable asbestos exists for nearby residents, some of whom live directly across the street from the Site. The contamination at the Site exists on the ground surface where it may easily migrate via dispersal through the air.

Weather conditions that may cause hazardous substances, pollutants, or contaminants to migrate or be released;

Lawrenceville, Illinois, receives an average yearly precipitation of 30.16 inches and an average yearly snowfall of 12.37 inches. In 2009, average temperatures ranged from 88 to 18 degrees Fahrenheit (°F). Exposure pathways consist of direct contact with released tars, impacted soil and inhalation of airborne asbestos-containing material (ACM) dust. Because of the extensive distribution of on-site wastes, exposure to hazardous substances could occur from human activities and weather-influenced distribution, redistribution, and suspension of ACM dust.

In late spring, the prevailing wind direction is from the south or southwest, blowing north or northeast towards residential areas of the town. During dry seasonal weather periods, prevailing

winds may carry uncontrolled ACM including friable asbestos away from the Site into residential areas.

The Embarras River is approximately one half mile from the Site. During heavy rain events, surface water off-site releases may result in contamination from the Site reaching the river.

Threat of fire or explosion

Material in Illinois EPA drum sample #301 had a flash point of less than 140° F, making it an ignitable waste, and thus, hazardous. Ignitable wastes present a potential threat of fire or explosion.

The availability of other appropriate federal or state response mechanisms to respond to the release;

The Illinois EPA does not have the resources to respond to the imminent threats at this Site. On March 11, 2010, the Illinois EPA submitted a letter to U.S. EPA requesting assistance from the U.S. EPA Region 5 Superfund Division to conduct a potential time-critical removal action at the Site.

IV. ENDANGERMENT DETERMINATION

Given the Site conditions, the nature of the known hazardous substances on-site, and the potential exposure pathways described in Sections II and III above, actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response actions selected in this Memorandum, may present an imminent and substantial endangerment to public health, welfare, or the environment.

V. PROPOSED ACTIONS

A. Proposed Actions

1. Proposed action description

The response actions described in this memorandum directly address actual or potential releases of hazardous substances on-site, which may pose an imminent and substantial endangerment to public health, or welfare, or the environment. The OSC proposes the following actions to mitigate threats posed by the presence of hazardous substances at the Pioneer Asphalt Site: Removal activities on Site will include:

1) Developing and implementing a Site Health and Safety Plan, including an air monitoring plan and Site contingency plan.

2) Developing and implementing a Site security plan.

3) Developing and implementing a fugitive dust and/or asbestos control plan sufficient to stabilize the Site. This air monitoring plan and all developed measures must control ACM dust during the removal action.

4) Delineating the nature and extent of all hazardous substances, pollutants and contaminants, including, but not limited to asbestos, BTEX, TPHs, and DROs, which may be found on Site; and investigating and closing all potential airborne, surface and sub-surface routes for off-site releases of hazardous substances, pollutants or contaminants

5) Characterizing, removing, and properly disposing of all asbestos-containing waste and all other on-site hazardous substances, pollutants or contaminants. This work may include, but is not limited to, hazardous substances, contaminants or pollutants found in building materials, small containers, drums and drum contents, tanks and tank contents, underground storage tanks, waste tars, spilled materials and contaminated soils located at the Site in accordance with U.S. EPA's Off-Site Rule (40 CFR § 300.440);

6) Developing and implementing a post-excavation sampling plan to confirm that this time-critical removal action has addressed all of the hazardous substances, pollutants and contaminants found on-site.

7) Backfilling excavated areas with clean fill and restoring the Site property.

The removal action will be conducted in a manner not inconsistent with the NCP. The threats posed by the known friable asbestos and asbestos debris, meet the criteria listed in Section 300.415(b)(2) of the NCP and the response actions proposed herein are consistent with any long-term remedial actions which may be required. However, elimination of hazardous substances, pollutants and contaminants that pose a substantial threat of release is likely to reduce or eliminate the need for any long-term remedial actions. Moreover, elimination of hazardous substances, pollutants and contaminants that pose a substantial threat of release should greatly minimize requirements for substantial post-removal Site controls and would be consistent with the provisions of Section 300.415(l) of the NCP.

1. Off-Site Rule

All hazardous substances, pollutants, or contaminants removed off-site pursuant to this removal action for treatment, storage, and disposal shall be treated, stored, or disposed of at a facility in compliance, as determined by U.S. EPA, with the U.S. EPA Off-Site Rule, 40 C.F.R. § 300.440.

2. Contribution to remedial performance

The proposed removal action anticipates no long-term remedial action will be needed.

3. Engineering Evaluation/Cost Analysis (EE/CA)

Not Applicable

4. Applicable or relevant and appropriate requirements (ARARs)

All applicable and relevant and appropriate requirements (ARARs) of Federal and State law will be complied with to the extent practicable.

Federal

U.S. EPA National Emissions Standards on Hazardous Air Pollutants 40 CFR Part 61, Subparts A and M.

State

The OSC received an ARAR list from Bruce Everetts, Illinois EPA Springfield Office, dated November 28, 2011. All state ARARs will be complied with to the extent practicable.

5. Project Schedule

It is expected that, if an agreement for performance of the work can be negotiated and finalized with Ziegler Chemical and Mineral Corporation, the PRP will commence the required field work no later than 30 calendar days from the effective date of the AOC. Also, it is expected that the PRP will complete all field requirements by the end of calendar year 2014.

The response actions described in this memorandum directly address actual or threatened releases of hazardous substances, pollutants or contaminants at the Site which may pose an imminent and substantial endangerment to public health and safety, and to the environment. These response actions do not impose a burden on the affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

The removal activities are expected to take 90 on-site working days to complete.

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Given the Site conditions, the nature of the hazardous substances and pollutants or contaminants documented on Site, and the potential exposure pathways to nearby populations described in Sections II, III and IV above, and given the actual or threatened release of hazardous substances and pollutants or contaminants from the Site, failing to take or delaying action may present an imminent and substantial endangerment to public health, welfare or the environment. This will increase the potential that hazardous substances will be released, thereby threatening the adjacent population and the environment. Delayed or non-action may result in the increased likelihood of exposure to hazardous substances through inhalation, ingestion or direct contact by human populations trespassing at or near the Site.

VII. OUTSTANDING POLICY ISSUES

None.

VIII. ENFORCEMENT

For administrative purposes, information concerning confidential enforcement strategy for this Site is contained in the Enforcement Confidential Addendum.

IX. RECOMMENDATION

This decision document represents the selected removal action for the Pioneer Asphalt Site, Lawrenceville, Lawrence County, Illinois, developed in accordance with CERCLA, as amended, and is not inconsistent with the NCP. This decision is based upon the Administrative Record for this Site (Attachment B). Conditions at the Site meet the NCP Section 300.415(b)(2) criteria for a removal action and I recommend your approval of the proposed removal action. You may indicate your decision by signing below.

APPROVE _____ DATE: 3/07/13
for Richard C. Karl, Director
Superfund Division

DISAPPROVE _____ DATE: _____
Richard C. Karl, Director
Superfund Division

Enforcement Addendum

Figures:

1 Site Diagram
2 Site Location Map
3 Lawrenceville Site Map
4 Photo Log

Attachments:

A. Environmental Justice Analysis
B. Index to the Administrative Record

cc: S. Fielding U.S. EPA, 5203-G
L. Nelson, U.S. Department of Interior, **w/o Enf. Attachment**
(Lindy_Nelson@ios.doi.gov)

T. Crause, Illinois EPA, **w/o Enf. Addendum**
Illinois EPA
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276

BCC PAGE HAS BEEN REDACTED

NOT RELEVANT TO SELECTION OF

REMOVAL ACTION

ENFORCEMENT ADDENDUM

PIONEER ASPHALT SITE

LAWRENCEVILLE, LAWRENCE COUNTY, ILLINOIS

ENFORCEMENT CONFIDENTIAL

NOT SUBJECT TO DISCOVERY

HAS BEEN REDACTED

SIX PAGES

ENFORCEMENT SENSITIVE

NOT APPLICABLE TO DISCOVERY

NOT RELEVANT TO SELECTION OF REMOVAL ACTION

ATTACHMENT A

ENVIRONEMENTAL JUSTICE ANALYSIS
PIONEER ASPHALT SITE
LAWRENCEVILLE, LAWRENCE COUNTY, ILLINOIS

Attachment A

R5 Superfund EJ Analysis for the Pioneer Asphalt Site

The area surrounding the Pioneer Asphalt Site was screened for Environmental Justice (EJ) concerns using Region 5's EJ Assist Tool (which applies the interim version of the national EJ Strategic Enforcement Assessment Tool (EJSEAT)). Census tracts with a score of 1, 2, or 3 are considered to be high-priority potential EJ areas of concern according to U.S.EPA Region 5. The Pioneer Asphalt Site is in a census tract with a score of **6** (Figure 1). Therefore, Region 5 does not consider this site to be a high-priority potential EJ area of concern.

Pioneer Asphalt Company Site Map Showing EJ SEAT Values For Surrounding Area

ATTACHMENT B

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

ADMINISTRATIVE RECORD
FOR
PIONEER ASPHALT SITE
LAWRENCEVILLE, LAWRENCE COUNTY, ILLINOIS

ORIGINAL
MAY 2012

ATTACHMENT

U.S. ENVIRONMENTAL PROTECTION AGENCY
REMOVAL ACTION

ADMINISTRATIVE RECORD
FOR
PIONEER ASPHALT SITE
LAWRENCEVILLE, LAWRENCE COUNTY, ILLINOIS

ORIGINAL
MAY 2012

NO.	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
1	00/00/00	Everetts, B., Illinois EPA	Turner, K., U.S. EPA	Letter re: IL EPA Identifies State ARARs for the Pioneer Asphalt Company	
2	00/00/99		File	Windows Media Player Presentation - Pioneer Asphalt Site - 1999	
3	09/00/03		File	Raw Materials List for May 1996 and September 2003 - Pioneer Asphalt Site	
4	07/01/10	Illinois EPA		News Release: "Illinois EPA Seals Pioneer Asphalt Lawrenceville and Refers Site to Attorney General for Enforcement, Agency Alleges Serious Soil and Water Pollution, Restricts Access"	
5	07/23/10	TEM, Incorporated	File	Asbestos Sampling Results from Samples Taken on July 20, 2010 at the Pioneer Asphalt Site	
6	07/28/10	Giannini, C., STAT Analysis Corporation	McClelland, J., Pioneer Engineering & Environmental Services, Inc.	Letter re: Transmittal of Attached Analytical Results for 1 Sample for the July 21, 2010 Referenced Project	
7	08/12/10	Rouanet, J., Prairie Analytical Systems, Inc.	Range, L., Illinois EPA BOL	Letter re: Transmittal of Attached Analytical Report for 12 Samples Received on July 21, 2010	
8	08/19/10	Everetts, B., Illinois EPA	BOL File	Memorandum re: Reconnaissance and Sampling Activities Conducted at the Pioneer Asphalt Site on July 19-20, 2010	

NO.	DATE	AUTHOR	RECIPIENT	TITLE/DESCRIPTION	PAGES
9	08/26/10	Everetts, B., Illinois EPA	Crosetto, T., U.S. EPA	Letter re: IL EPA Request that U.S. EPA Assign an OSC and Consider Conducting a Time-Critical Removal Action at the Pioneer Asphalt Company Site	
10	10/06/10	Midwest Environmental Consulting Services, Inc.	Pioneer Asphalt Corporation	Asbestos Sampling Report for the Former Pioneer Asphalt Corporation Facility	
11	10/08/10	Weston Solutions, Inc.	U.S. EPA	Title Search Report for Pioneer Asphalt Site	
12	11/10/11	El-Zein, J., U.S. EPA	Ziegler Chemical & Mineral Corp.	General Notice of Potential Liability and Request for Information (104E) re: the Pioneer Asphalt Site	
13	12/13/10	Manewitz, M., Manewitz & Studholme, L.L.C.	Ropski, C., U.S. EPA	Letter re: Response of Pioneer Asphalt Corp. and Ziegler Chemical & Mineral Corp. to U.S. EPA 104E Letter Dated 11/10/11	
14	00/00/00			Action Memorandum: Pioneer Asphalt Site **(PENDING)**	

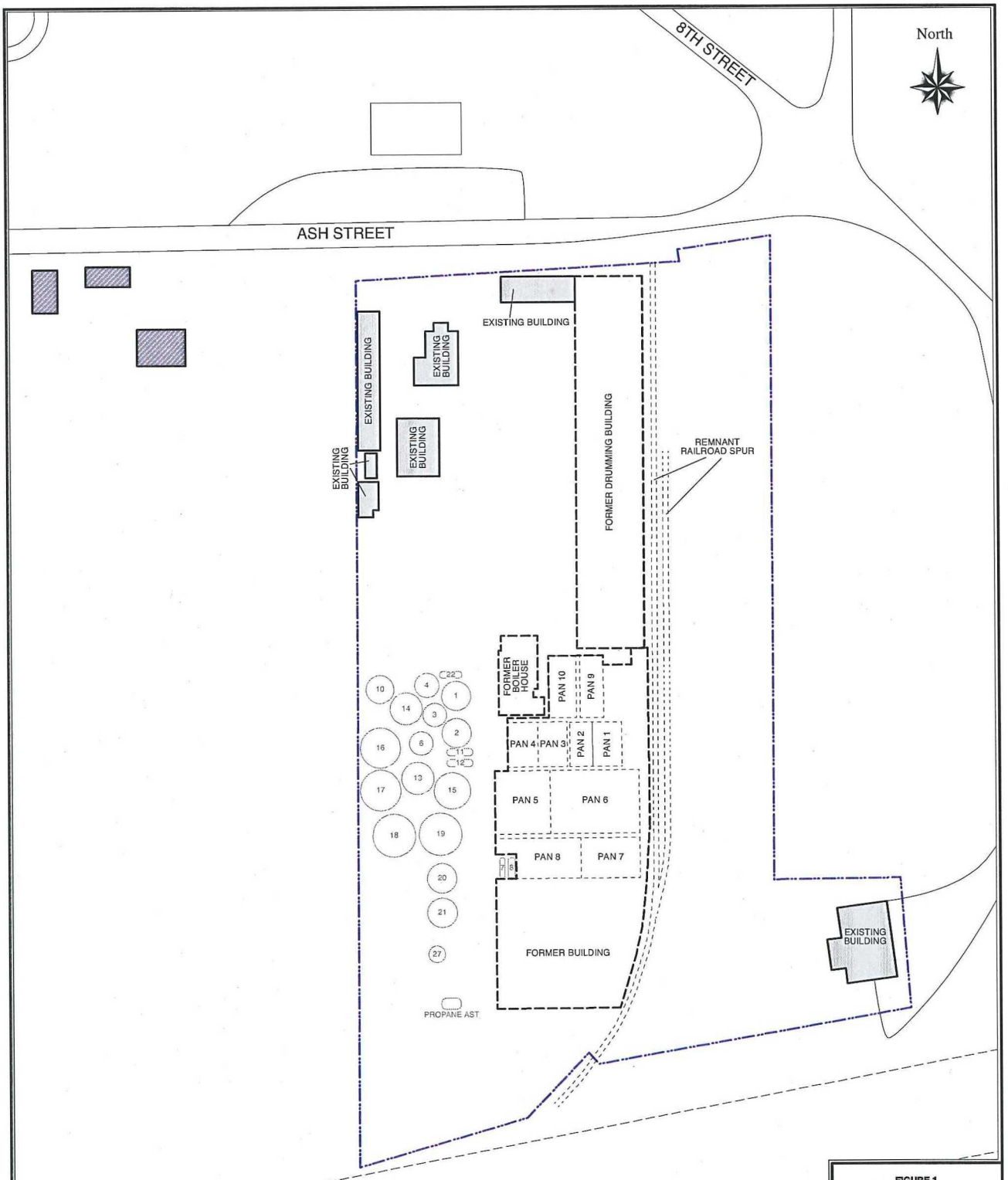


FIGURE 1
Site Diagram
802 Ash Street
Lawrenceville, IL

Scale:	1"=100' (0' — 100')
Drawn by:	Jackson Toomey
Job No:	10-0417-101
Date:	October 2010
Checked by:	Jeff McClelland

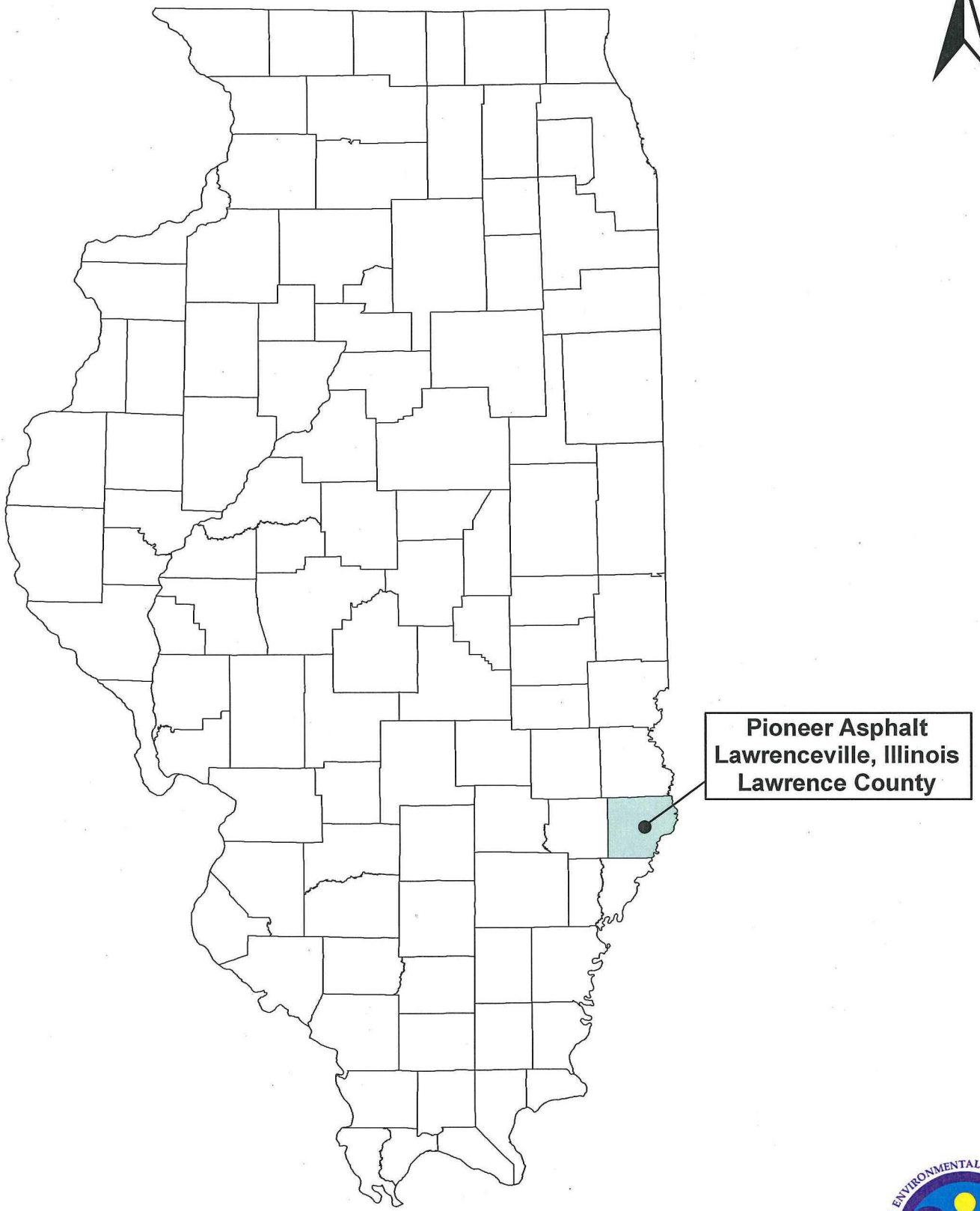
Legend:

Approximate Property Line

(1) Aboveground Storage Tank

PIONEER
ENGINEERING & ENVIRONMENTAL SERVICES, INC.

Figue 2
Site Location Map



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

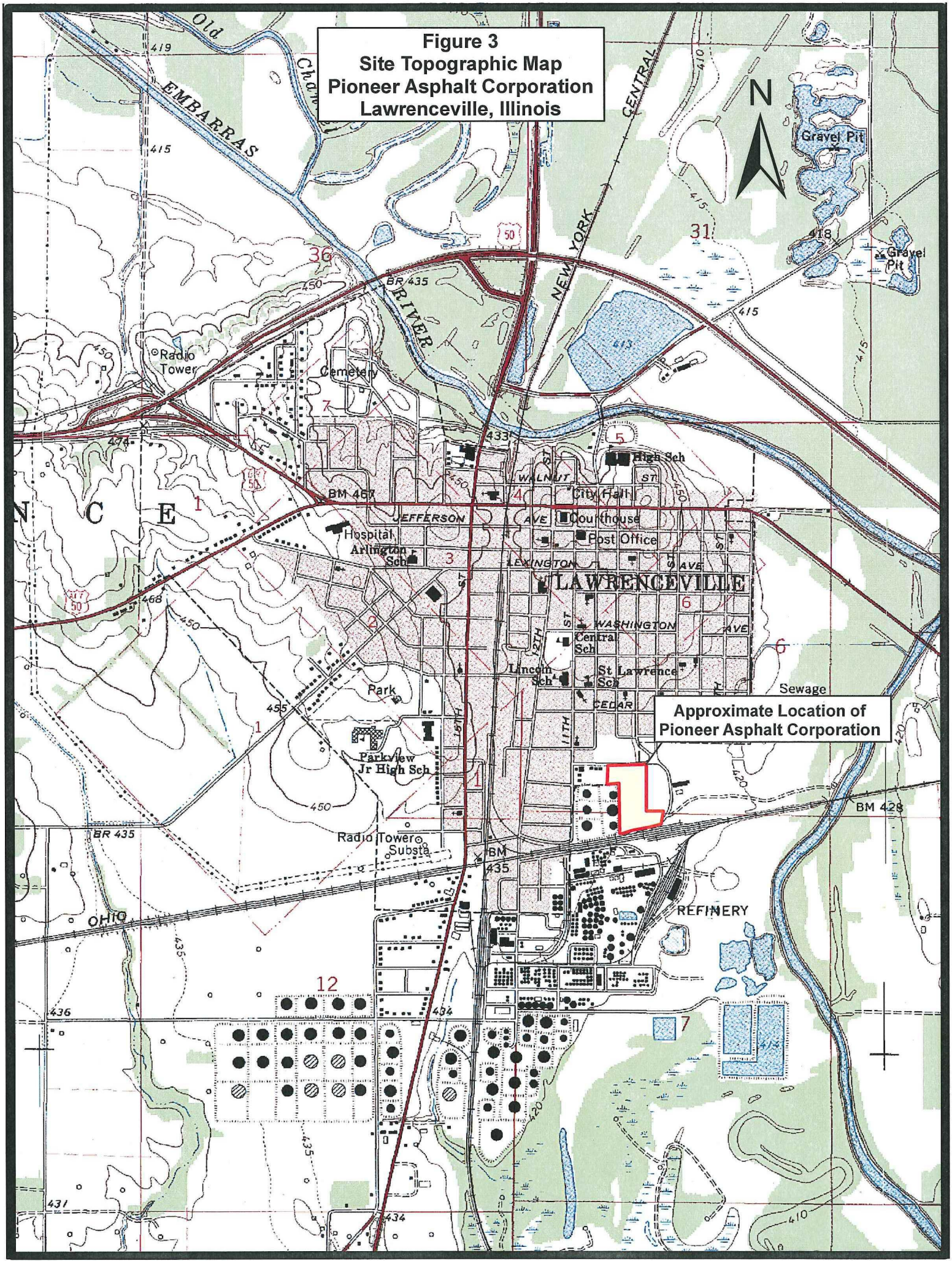


Figure 3
Site Topographic Map
Pioneer Asphalt Corporation
Lawrenceville, Illinois
N
Approximate Location of
Pioneer Asphalt Corporation
LAWRENCEVILLE
EMBARRAS
RIVER
NEW YORK CENTRAL
Old
Gravel Pit
Gravel Pit
Radio Tower
Cemetery
BR 435
BM 467
High Sch
City Hall
Courthouse
Post Office
Hospital
Arlington Sch
JEFFERSON AVE
LEXINGTON AVE
WASHINGTON AVE
WALNUT ST
Central Sch
Lincoln Sch
St Lawrence Sch
Park
Parkview Jr High Sch
Sewage
CEDAR
12TH ST
11TH ST
Radio Tower
Substa
BM 435
BM 428
REFINERY
OHIO
BR 435

Figure 4 – Pioneer Asphalt Photo Log

Photo 1: Deteriorated Cardboard Drums

Photo 2: Abandoned Drums (contents – off-spec tars and solvents)

Photo 3: Large tank cut at fluid level (contents waste tar)

Photo 4: Horizontal Tank (Asbestos Wrapped)